

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

HUI MINN LEE,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 1:18-cv-1046
	)	
MARKET AMERICA, INC.,	)	
	)	
Defendant.	)	

**DEFENDANT MARKET AMERICA, INC.'S ANSWERS TO PLAINTIFF'S  
FIRST SET OF INTERROGATORIES**

COMES NOW Defendant, Market America, Inc., (hereinafter "Market America" or "MA"), who after first being duly sworn and pursuant to provisions of Rules 26 and 33 of the Federal Rules of Civil Procedure and hereby responds to the Plaintiff's First Set of Interrogatories and avers:

1. Please provide the name, address and telephone number of any individual the Defendant contends has knowledge of any facts raised in either the Amended Complaint or Answer to the Amended Complaint. Please describe with specificity what that person has knowledge of.

**ANSWER:**

**See Initial Disclosures.**

2. Please provide the name, address and telephone number of any witness you intend to offer, or who may be offered, to testify at the trial of this matter. Please describe with specificity the facts the Defendant believes that witness will offer testimony.

12) Please describe and state with specificity each and every reason for the Plaintiff's separation of employment.

**ANSWER:**

**Plaintiff was separated from her job for her repeated failure to work with her direct supervisor, perform tasks assigned to her, work with new software, adapt and change her work, failure to properly complete her training sessions as requested, and failure to be a team player.**

13) Please identify by job title each and every position that was open and available at the time of, or within three (3) months after, the Plaintiff's termination.

**ANSWER:**

**OBJECTION. MA objects to this interrogatory as it is overly broad and not relevant. To provide all job openings not within Ms. Lee's skill set or location would not be relevant to this case.**

**Without waiving the foregoing, the following positions were available during the time period requested:**

Project Manager	Social Media	Product Information Specialist
Corporate Controller	Community Manager	Copy Writer - Asia Markets
Blog Manager	Beauty and Cosmetics	2nd Shift Accounts Representative
Blog Manager	Mobile Applications	Accounts Service Rep Bilingual
Copywriter - Asia	Architect	Mandarin
Markets	Web Analyst	Business Analyst - Bilingual
Senior Accountant	Intern(s) - Fall	Travel Concierge
TEST Recruiting	Semester	Purchasing Agent
Coordinator	Translator - Mandarin	Director of Field Compliance
Product Information	Mobile Applications	Unauthorized Online Sales Specialist
Specialist	Architect	Unauthorized Online Sales Specialist
Marketplace	Recruiter - Hospitality	Travel Coordinator
Operations	Service Staff	Senior Graphic Designer
Representative	Product Manager	Product Information Specilaist
Purchasing Agent	Beauty-Cosmetics	Travel Consultant
Social Media	Travel Coordinator	Vendor Account Specialist
Community Manager	Events Manager	Marketing Product Manager -
Brand and Web	Travel Consultant	Parenthood Lines
Manager	Product Manager	International Product Manager / Spain
Senior Accountant	International	and Mexico
Purchasing Agent		Copywriter
Senior Accountant		

Web and Brand  
Manager  
Marketplace  
Operations  
Representative  
Social Media  
Community Manager  
Health and Beauty  
Help Desk  
Administrator  
Travel Coordinator  
Business Analyst  
Lead QA Engineer  
Social Media  
Community Manager  
Events Coordinator  
Events Coordinator  
Product Manager -  
US/CAN

Administrative  
Assistant - Creative  
Services  
Administrative  
Assistant  
Research Specialist  
HR Manager  
Social Media  
Community Manager  
Beauty and Cosmetics  
Data Processing  
Representative  
Travel/Events  
Administrative  
Assistant  
Business Analyst

Product Information Specilaist  
Help Desk Administrator  
IT Project Manager  
Marketing Product Manager Health  
and Nutrition  
QA Lead  
Internet Services Product Manager  
Corporate Counsel  
Director of Release Management  
Test Automation Engineer  
Product Information Specilaist  
Copywriter  
Accounts Services Representative  
Purchasing Agent  
Python Software Engineer  
Business Analyst  
JAVA Software Engineer  
Universe Engineer  
Internet Services Product Manager  
TLS Administrator  
Merchant Content Coordinator  
Graphic Designer - Print  
Unauthorized Online Sales  
Specialist  
Benefits Specialist  
SEO Program Manager  
Copywriter  
Merchandising Manager

This the 13<sup>th</sup> day of October, 2020.

As to objections only:



Camilla F. DeBoard  
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